

EXHIBIT

A

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May 22, 2019

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RE: *Powell, et al. v. Oldham*
Our File No. 16711.001

Dear Colleagues:

We want to begin taking depositions in this case.

In addition to the named individual defendants in the case, we will also want to take a 30(b)(6) deposition of each of the named "entity defendants." As to individuals who are not defendants, we will want to take the following depositions:

- Ed Raper
- Hon. Bill Anderson
- Hon. Mark Ward
- Hon. Gerald Skahan

At this point we just want to make sure you are available on the following dates so we can begin scheduling these:

- July 1, 2, 3, 22, 23, 24, 25, 26, 29, 30, and 31, 2019
- August 1, 2, 5, 6, 7, 8, 9, 14, 15, and 16, 2019

I look forward to hearing from you.

Sincerely,



Michael G. McLaren

MGM/clw
cc: Brice M. Timmons, Esq. (Via Email)
William E. Cochran, Esq. (Via Email)